

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

Z.P., ET. AL,)	
Plaintiffs;)	
)	
vs.)	7:24-CV-00151-ACA
)	
ERROL GREGORY BRYANT,)	
Defendant.)	

DEFENDANT’S SECOND MOTION TO EXTEND DEADLINES

COMES NOW, the Defendant, by and through his attorney of record and moves this Honorable Court to extend all deadlines in the agreed upon scheduling order by an additional seven days and in support thereof would show the following:

1. That pursuant to the Order of this Court, the parties met and submitted an initial scheduling order.
2. That the parties held a scheduling conference in the chambers of this Honorable Court and agreed to a final version of the scheduling order.
3. That pursuant to this Order, the first of the filings by the Defendant were due 31 January 2025.

4. That attorney for the Defendant, Andrew Clay, withdrew from representation almost immediately following the Rule 26 meeting of the parties.
5. That Mr. Clay was retained by the Defendant to lead the defense of his case. Mr. Wollitz was to serve in an advisory role to Mr. Clay and assist him with trial if necessary.
6. That upon Mr. Clay's withdrawal from representation, Mr. Wollitz asked this Honorable Court for a fourteen day extension of all deadlines while the Defendant retained new counsel.
7. That the Defendant has been diligent in seeking new counsel and on 12 February 2025 had an initial consultation with an attorney who he believes will accept representation moving forward subject to additional time to further familiarize himself with the facts of the case.
8. That prospective new counsel referred to herein will be lead counsel on the case, charged with handling the day-to-day litigation of the defense.
9. That Mr. Wollitz will remain as co-counsel of record to assist prospective new counsel in the defense of the case in whatever capacity requested.
10. That prospective new counsel requires the additional time beyond the requested fourteen days to competently and accurately familiarize themselves with the facts of the case.

11. That the Defendant respectfully requests seven days to file his answer and initial disclosures.

12. That counsel for the defendant will be concurrently working on the interrogatories and requests for production.

13. That counsel for the Defendant respectfully requests an extension of seven days to allow new counsel time to prepare and file the Defendant's answer, initial disclosures, and interrogatories and requests for production.

WHEREFORE, premises considered, the Defendant, by and through his attorney of record and moves this Honorable Court to extend all deadlines in the agreed upon scheduling order by an additional seven days.

Respectfully submitted,

/s/ Jason L. Wollitz
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CERTIFICATE OF SERVICE

COMES NOW, Jason L. Wollitz, Attorney at Law, and does hereby certify that I have served a copy of the foregoing on this the 14th day of February 2025 via electronic transmission, telephone notification or hand delivery.

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Respectfully Submitted,

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